

December 22, 2017

Dan Dallas
Rio Grande Forest Supervisor
Attn: Forest Plan Revision
1803 W. U.S. Highway 160
Monte Vista, CO 81144

Dear Mr. Dallas:

I appreciate the opportunity to provide comments on the draft Rio Grande forest plan. I will focus my comments on the wilderness recommendations and other special on the forest.

I strongly support the proposed additions to the Sangre de Cristo Wilderness. I worked diligently on the legislative campaign to secure designation of the Sangres in the 1993 Colorado Wilderness Act, both in a volunteer capacity for conservation groups and as a conservation NGO staffer. The Sangres was the most convoluted wilderness boundary among any of the 18 or so areas included in the 1993 legislation, with perhaps 200 miles of boundaries covering the length of the range on both sides and all the ins and outs of various drainages. Not surprisingly, that meant some boundaries received less consideration than others. The legislative wrangling focused mostly on the east side, around the Comanche-Venable area, and the South Colony Lakes road, and the Rainbow Trail and various motorized routes branching from it. The west side received considerably less attention, other than the Lake Como-Blanca Peak portion. Thus I am pleased to see the Rio Grande propose to improve the west side boundaries after these many years, and in response to the significant Baca Mountain Tract acquisition.

Sangres additions – Butterfly Creek – Miller Creek:

The additions to the northern end of the Sangres, north of Villa Grove, are particularly beneficial in terms of adding poorly represented ecosystems to the wilderness, and in moving the boundary down to a more obvious location, rather than the current boundary that is rather arbitrarily located mid-slope. The oak savannah ecosystem that is typical of the lowermost slopes of Sangres makes for a complete ecological transition within the wilderness from the grasslands of the San Luis Valley to the tundra atop the Sangres.

Sangres Additions – Crestone-Kit Carson Peak:

Similarly, the additions north of Crestone add pinyon-juniper woodlands at the lowest elevations, along with many stream corridors that have unusual riparian vegetative associations. Nearly every one of these stream corridors – Cotton Creek, Garner Creek, Wild Cherry Creek, Dimick Gulch, South Crestone Creek, Willow Creek, Spanish Creek, etc – is identified by the Colorado Natural Heritage Program as a Potential Conservation Area with globally significant plant communities.

It is particularly heartening to see the Rio Grande recommend a topographically sensible boundary for the Kit Carson Peak portion, made possible by the Baca Mountain Tract acquisition. This addition would complete the robust conservation complex of the Sangres Wilderness, Great Sand Dunes National Park, and Baca National Wildlife Refuge. It is also one of the premier primitive recreation destinations in the Sangres.

Sangres Additions – Blanca Peak-Little Bear:

I am pleased to support the addition proposed around Blanca Peak and Little Bear. When the 1993 legislation was moving to its final conclusion, one of the congressional offices essentially misread the maps and concluded the Lake Como jeep road went all the way up Blanca Peak, hence the wilderness boundary was drawn along that alignment and the 14ers were omitted. The Blanca-Little Bear addition is a critical centerpiece amidst surrounding conservation lands and opportunities. The addition brings the wilderness boundary adjacent to the Trinchera Ranch. It also then makes possible the future wilderness addition of Lily Lake and the Huerfano River headwaters on the Pike-San Isabel NF, where the management situation has significantly improved with major inholding acquisitions over the years. It is great to see the Rio Grande take the lead on piecing together this last missing aspect for completing the wilderness protection of the Sangres.

South San Juan wilderness additions:

I am very supportive of the Cumbres addition to the South San Juans, and incorporating the lower few miles of Elk Creek into the wilderness. This is a primary gateway into the wilderness, and extending the wilderness boundary down nearer to the trailhead ensures that the entire stream valley will retain its wilderness appeal and be managed in concert with the adjacent wilderness. I would have loved to see Chama Basin similarly included, but understand the concerns about motorized trail uses and snowmobiles.

Beartown/Indian Ridge addition to the Weminuche:

I've had the opportunity to hike the Continental Divide Trail above Beartown and Kite Lake on several occasions. The CDT here drops down off the Divide and exits the wilderness for a couple of miles to skirt Kite Lake and Hunchback Mountain, the only stretch of the CDT for 85 miles between Stony Pass and Wolf Creek Pass that is not in wilderness. The proposed wilderness addition sweeps this one segment of non-wilderness CDT into the adjacent wilderness and provides completion for one of the longest entirely wilderness trail experiences in the Rocky Mountains.

Rio Grande Headwaters:

From Durango, I spend a lot of time around Stony Pass and the Rio Grande headwaters. This uppermost length of the Rio Grande is one of the most remarkable undeveloped river valleys in the San Juans. From Stony Pass to Rio Grande Reservoir, this is a remote and difficult to access valley, yet vast in scale and containing robust wetlands and beaver ponds. It is remarkable both for the Rio Grande National Forest, and also in a larger regional context. I encourage you to re-evaluate its eligibility under the Wild and Scenic Rivers Act.

Saguache Creek–Four Mile–Taylor Canyon:

One of the most interesting places on the Rio Grande NF is where the grasslands and ponderosa forests along Saguache Creek rise towards the Continental Divide. The potential wilderness unit encompassing Saguache Creek-Four Mile-Taylor Canyon proposed in Alternative D is unlike really anything else in Colorado. I've had the opportunity to travel in all of the state's wilderness areas, and even wrote a guide to Colorado's wilderness areas many years ago with photographer John Fielder. Without a doubt, the grassland and ponderosa ecosystem of this area is unparalleled among the designated wilderness areas in Colorado. Saguache Creek's roadless canyon is a delight in and of itself, a favored destination of anglers, hikers, and backpackers. I appreciate the determination that Saguache Creek is eligible for protection as a Wild and Scenic River, though the classification obviously should be "wild" given its roadless character. But I urge the Rio Grande NF to also propose the area for wilderness in its final recommended plan.

La Garita Wilderness additions:

La Garita is one of the five original Colorado wilderness areas designated in 1964. The original wilderness was a scant 48,600 acres and located largely on the Gunnison National Forest. The 1980 Colorado Wilderness Act expanded the wilderness though again mostly on the Gunnison National Forest, and then finally the 1993 Colorado Wilderness Act further expanded the wilderness to include a substantial addition on the Rio Grande with Silver Park and Wason Park surrounding Wheeler geologic area. The current plan is an opportunity to further consolidate the wilderness boundary. A small addition would put the entirety of the Middle Fork of Saguache Creek headwaters into the wilderness, whereas currently only the south half of the drainage is protected.

Another prime opportunity to enhance the wilderness character of the existing wilderness is the Wason Park addition. Including Wason Park in the La Garita Wilderness would sweep in a surprisingly large amount of the Continental Divide Trail, about 8 miles of CDT that would now be entirely within the wilderness. Wason Park is one of the largest, contiguous potential wilderness additions possible on the Rio Grande NF. I urge the Rio Grande to consider the benefit to securing the wilderness character of the CDT by proposing this wilderness addition.

Wolf Creek Pass corridor:

As you well know, Wolf Creek Pass is one of the most critical landscape linkages in the Southern Rockies. Maintaining its integrity for wildlife movement is crucial to the long-term future of our region's wildness and value as a safe harbor for wildlife. In a world with a changing climate, species such as lynx or even wolverine that depend on cold, snowy, higher elevation locations are going to be squeezed into smaller suitable habitat, making pinch points like Wolf Creek Pass all the more important. I would strongly recommend the Rio Grande NF emphasize the priority of the Wolf Creek Pass landscape with a special designation that both includes the requirements of the Southern Rockies Lynx Amendment as well as highlights its overall value for connectivity.

Again, I appreciate the opportunity to comment and look forward to the final plan.

Sincerely yours,

A handwritten signature in black ink that reads "Mark Pearson". The script is cursive and fluid, with the first letters of the first and last names being capitalized and prominent.

Mark Pearson
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